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February 4, 2011

### **By ECF and Overnight Mail**

Honorable Susan D. Wigenton  
United States District Court of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut St.  
Newark, NJ 07101

**Re: *Prystowsky, et al. v. TGC Stores, Inc. et al.***  
Civil Action No. 2:07 -cv-00072 (SDW)  
Our File No.: 09-018

Dear Judge Wigenton:

We represent Pride Mobility Products Corp. in the above matter. Pride has moved for summary judgment and, pursuant to Local Civil Rule 7.2(b), we are writing for leave to submit up to a twenty-five (25) page reply brief. Our reply brief must be filed on February 8, 2011.

We are seeking permission to submit up to a 25-page reply brief as Plaintiff's opposition to Pride's motion for summary judgment included a 40-page opposition brief, with Exhibits "A through "BB"; a 16-page attorney affidavit, with numerous exhibits; a 29-page Rule 56.1 statement in response and supplemental statement of disputed facts; and five (5) other multi-page affidavits, with numerous exhibits. Although we will endeavor to keep our reply brief as concise as possible, it will be necessary to have more than 15 pages in order to address all of the arguments raised in plaintiff's opposition.

We contacted plaintiff's counsel this morning about their consent to this application and have not yet received confirmation on their position.

**MIRANDA SAMBURSKY SLONE SKLARIN VERVENIOTIS LLP**

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**HONORABLE SUSAN D. WIGENTON**

**FEBRUARY 4, 2011**

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Respectfully submitted,

**MIRANDA SAMBURSKY SLONE SKLARIN VERVENIOTIS LLP**

s/\_Neil L. Sambursky

Neil L. Sambursky

cc: All Counsel (by ECF)